

By: Daniel JT McKenna, ID No. 93930

Counsel for Defendant

BALLARD SPAHR LLP

1735 Market Street, 51st Floor

Philadelphia, PA 19103-7599

Tel: (215) 864-8321

Fax: (215) 864-8999

mckennad@ballardspahr.com

CODY WOOD

Plaintiffs,

v.

CAPITAL ONE BANK (USA), N.A.,
NATIONAL ASSOCIATION

Defendant.

COURT OF COMMON PLEAS OF
SUSQUEHANNA COUNTY

CIVIL ACTION NO: 19CV804CP

NOTICE OF FILING NOTICE OF REMOVAL

TO THE PROTHONOTARY:

PLEASE TAKE NOTICE that Defendant Capital One Bank (USA), N.A.

("Capital One") has removed this case to the United States District Court for the Middle District of Pennsylvania. Pursuant to 28 U.S.C. § 1446(d), "the State court shall proceed no further unless and until the case is remanded." A copy of the Notice of Removal filed in the United States District Court is attached as Exhibit 1.

Respectfully Submitted,

Dated: October 2, 2019

/s/ Daniel JT McKenna

Daniel JT McKenna, ID No. 93930

BALLARD SPAHR LLP

1735 Market Street, 51st Floor

Philadelphia, PA 19103-7599

Telephone: (215) 864-8321

Facsimile: (215) 864-8999

mckennad@ballardspahr.com

*Attorney for Defendant Capital One Bank
(USA), N.A.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Notice of Filing Notice of Removal was served on this date, October 2, 2019, upon the following by e-mail:

Brett Freeman
SABATINI FREEMAN, LLC
216 N. Blakely St.
Dunmore, PA 18512
Phone: (570) 341-9000
brett@sabatinilawfirm.com
Attorneys for Plaintiff

/s/ Daniel JT McKenna
Daniel JT McKenna, Esq.